

- Responding to all reports of inappropriate content within 24 hours;
- Increasing significantly the number of employees who review images and content on the MySpace website;
- Implementing filtering technology that effectively blocks sexually explicit or violent images;
- Immediately deleting any profiles that violate MySpace's Terms of Use Agreement and permanently banning those members from using the site;
- Immediately removing all advertisements and other MySpace sponsored content that are inappropriate for children; and
- Offering free, downloadable software that allows parents to block use of MySpace.

AG Reilly's staff met with MySpace in March 2006 to discuss their concerns with how the website operated. Although MySpace maintains that only members under the age of 18 can view the profiles of members ages 14-15 years old, AG Reilly's Investigation found that MySpace does not have any system in place to verify its members' ages. As a result, an adult can register as a minor member and use that profile to seek access to the profiles of countless underage members.

AG Reilly's Investigators were able to register as minors 14 and 15 years old. The Investigators were then able to gain access to numerous profiles of children between the ages of 14 and 17 years old.

The Investigators also discovered that any user, regardless of age, can browse the MySpace website and find forums where children are posting messages. In these various forums, adults can not only view the child's picture, age, and hometown, but they can also communicate with the child.

AG Reilly criticized MySpace's own content on its website for contributing to the exposure of children to inappropriate content and communications. For example, the investigation revealed that MySpace regularly advertises 18+ "Intimate Dating" sites in its "High School" forums. During the investigation, MySpace's own search parameters allowed 14 and 15 year olds to search the site for "swingers" or designate themselves as "smokers" or "drinkers" in their user profiles.

AG Reilly's Office has become a known and respected resource on the ever-evolving world of the Internet, particularly as it relates to child safety. Since taking office, AG Reilly has devoted unprecedented resources to protecting Internet users and has dedicated staff specifically to education and training efforts.

As part of an effort to enhance parental awareness of online safety for children, AG Reilly's Office is leading a series of workshops throughout Massachusetts to educate parents about the dangers that children face when using the Internet. Today AG

Reilly will conduct an Internet Safety program for parents in Weymouth warning them of the potential dangers that exist when their children use the Internet. In an April sting operation, AG Reilly charged six people for allegedly using the Internet to possess or disseminate child pornography.

AG Reilly has also worked to make the Internet safe for consumers, recently publishing a revised Consumer Guide to the Internet that provides parents with tips on how to make their children's online activities safer. Safety tips also describe how to avoid identity theft and so-called "phishing" schemes.

[Return to article list](#)

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ATTORNEY GENERAL OF TEXAS

GREG ABBOTT

May 22, 2006

Mr. Christopher DeWolfe  
Chief Executive Officer  
MySpace, Inc.  
1333 Second St.  
Santa Monica, California 90401

Mr. John Hiler  
Chief Executive Officer  
Xanga.com  
555 8th Ave. FL. 21  
New York, New York 10018

Mr. Mark Zuckerberg  
Chief Executive Officer  
TheFacebook, Inc.  
471 Emerson St.  
Palo Alto, California 94301-1605

Mr. Jonathan Abrams  
Chief Executive Officer  
Friendster, Inc.  
1380 Villa St.  
Mountain View, California 94041

Dear Sirs:

As Attorney General of Texas, I have become increasingly concerned about the reports of sexual predators using social networking websites such as MySpace.com, Xanga, Friendster and Facebook to lure young children into dangerous, potentially life threatening situations. To that end, today I am writing to urge you to take measures to protect the millions of children who use your services daily. By taking a few proactive steps, you can make your websites safer for all users, especially children.

**Identity Verification**

By not requiring bank account information or a credit card in order to access your services, you have no way of authenticating the identity or age of your users, thereby providing a blanket of anonymity to those who wish to engage in criminal activity on your website. I request that you take steps to verify the identity of those individuals using your sites to post harmful or illegal images and to engage in two way communications. Although I understand that you currently use an age verification system, our investigators have found it uncomfortably easy in a relatively short period of time to locate many underage profiles on your sites. A system of identity/age verification via credit card or a verified e-mail account would be a better system than the current methods used by your websites.

**Child Pornography Identification**

I understand that software exists which scans photographic images before they are posted on user accounts or anywhere else on your sites. The software assigns a hash value (based on algorithms) to each photograph and then attempts to match it against a database, maintained by your sites, that contains the hash values of many known images of child pornography. This software is already being utilized by AOL to prevent images of child pornography from being

May 22, 2006  
Page 2

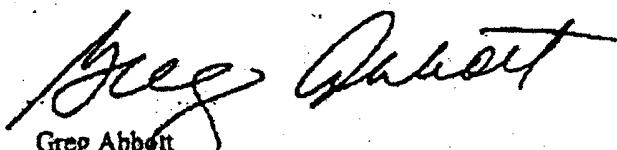
transmitted via e-mail. You should install the same database that automatically scans all uploaded images prior to allowing them to be posted on your systems. When an image's hash value matches that of a known image of child pornography, the posting of that image could be blocked and the incident reported to the proper authorities.

**Oversight of Websites**

Finally, I urge you to consider increasing the number of staff dedicated to reviewing images and profiles which violate the terms of use policies of your websites. With hundreds of thousands of new users registering daily, it is impossible to keep up with this responsibility with current resources.

I know many state officials are calling on you to stand up for the safety and security of our children. I add my voice to theirs and hope you will choose to do what is right for our children. While the young girls of my generation wrote in diaries that protected their life stories under lock and key, the young children of today post the most intimate details of their lives in a public forum, one where sexual predators lurk around every corner. I look forward to hearing from you in the near future about the actions you will be taking on this very important matter.

Sincerely,



Greg Abbott  
Attorney General of Texas

HECTOR L. DIAZ

Bronx County Clerk



Due	\$210.00
Recd INDEX NUMBER	106
Change	\$0.00
2006-06-24 10:14 AM PC FCB/ATM	

## APPLICATION FOR INDEX NUMBER

Pursuant to Section 8018 (a) Civil Practice Law and Rules

FEE: \$ 210.00

SUPREME COURT: BRONX COUNTY

FULL TITLE OF ACTION OR PROCEEDING (Please type or print)

Plaintiff: Jane Doe, Individually and As Next of Friend of Julie Doe, a minor.  
 vs.  
 Defendant: MySpace Incorporated; and News Corporation.

Third Party (If applicable)

Application for Index Number filed by:

 Plaintiff  Defendant

Is this action for a provisional remedy, no action pending?

 Yes  No

Type of Action:

<input type="checkbox"/> Tort	<input type="checkbox"/> Motor Vehicle	<input type="checkbox"/> Other-Personal Injury
<input type="checkbox"/> Contract		
<input type="checkbox"/> Commercial		
<input type="checkbox"/> Matrimonial	<input type="checkbox"/> Contested	<input type="checkbox"/> Uncontested
<input type="checkbox"/> Tax Certiorari		
<input type="checkbox"/> Other (Please Indicate)		

For Plaintiff or Petitioner:

Name: Arnold I. Itkin (Nickolas G.  
 Address: 700 Louisiana St. Suite 4700  
 Town Zip: Houston Texas 77002  
 Telephone Number: 713 222-3800

For Defendant or Respondent:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Town Zip: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

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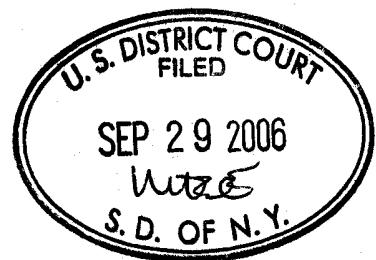
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UNITED STATES DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF NEW YORK

----- X  
JANE DOE, Individually and §  
As Next Friend of JULIE DOE, a minor, §  
Plaintiffs, §  
v. §  
MYSPACE, INC., and §  
NEWS CORPORATION, §  
Defendants. §  
----- X

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S.D.N.Y.

06 CV 7880  
Case No. 06 CV 7880  
JUDGE CEDARBAUM



**MYSPACE, INC.'S RULE 7.1 DISCLOSURE STATEMENT**

Pursuant to Rule 7.1(a) of the Federal Rules of Civil Procedure, the undersigned counsel for MySpace Inc. certifies that MySpace Inc. is owned 100% by Fox Media Interactive Inc., which is owned 100% by News Corporation.

Dated: September 29, 2006

**VINSON & ELKINS L.L.P.**

By: Clifford Thau 8708

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